

BALLON STOLL P.C.

COUNSELLORS AT LAW

FOUNDED 1931

810 SEVENTH AVENUE
SUITE 405
NEW YORK, NY 10019
Ph: 212-575-7900

www.ballonstoll.com

September 7, 2023

MARSHALL B. BELLOVIN, ESQ.
mbellovin@ballonstoll.com

VIA ECF

The Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street, Room 1010
New York, NY 10007

Application GRANTED. The deadline for
the parties' submission of their settlement
papers is extended to **September 21, 2023**.

The Clerk of Court is directed to terminate
ECF No. 32.

RE: Bitsadze v. Simonsen et al.,
Docket No. 22-cv-03142 (JHR)

SO ORDERED.



Jennifer H. Rearden, U.S.D.J.
Date: September 8, 2023

Dear Judge Rearden:

This office represents the Defendants, Lisa Simonsen and Charles N. Atkins (collectively "Defendants") in the above-referenced action. We write with the consent of the opposing counsel, to respectfully, jointly request a two (2) week extension of time to submit the settlement agreement to the Court along with a joint letter explaining the basis for the proposed settlement and why, if the parties contemplate dismissal under Rule 41, it should be approved as fair and reasonable.

The parties are still negotiating the terms of the Settlement Agreement and require the additional time to finalize the Agreement.

This is the first request for an extension of time to submit the Settlement Agreement and Joint Letter.

Thank you for your time and consideration of this request.

Respectfully submitted

s/Marshall Bellovin
Marshall B. Bellovin, Esq.

cc.: Adam Sackowitz, Esq. (via ECF)